

1 District Judge James L. Robart  
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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

9 JULIO CURY, *et al.*, \* Civil Action No.: 2:23-cv-00499-JLR

10 Plaintiffs, \*

11 v. \*

12 DEPARTMENT OF STATE, *et al.*, \*

13 Defendants. \*

14 \* \* \* \* \*

\* PLAINTIFFS' UNOPPOSED  
EMERGENCY MOTION TO SEAL

15 Plaintiffs hereby request that the Court immediately seal Dkt. #23-1, which is Exhibit 1 to  
16 the Howard Declaration filed with Defendants' Motion for Summary Judgment. These records  
17 include extremely sensitive personal information about Plaintiff Cury located only in the systems  
18 of United States Customs and Border Protection ("CBP"). There is no public interest in the  
19 immigration records of a private individual which would outweigh his significant privacy  
20 interests, and it was extraordinarily improper for CBP to file these records on the public record  
21 while simultaneously arguing that even the *names* of third parties must be withheld "to protect  
22 the personal privacy of individuals." (Dkt. #23 at 3.) It would be a manifest injustice to force  
23 Cury or any other plaintiff to choose between litigating his right to access government records  
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1 about himself and keeping sensitive information contained in those records from being disclosed  
2 to the general public at large.

3 Defendants' counsel has stated that they do not oppose this Motion.

4 Date: October 11, 2024

5 Respectfully submitted,

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